

EXHIBIT 6

From: Jim Butler
Sent: Saturday, June 20, 2020 10:05 AM
To: 'Bill Cash'; Ramsey Prather; pbates@philipbates.net; Nathanson, Paul J.; 'Haynes, Antonio M.'; Kim McCallister
Cc: Cheryl L. Haas (chaas@mcguirewoods.com); Sara Anne Ford; 'jwirt@wirtlawfirm.com'
Subject: RE: Synovus adv. Sport & Wheat: Documents Used During Deposition

Mr. Cash:

We've had multiple conferences with you about this subject, most recently during the deposition itself. It is our view that the statements in your email are untrue, but the deposition transcript will speak to that.

Your lawsuit has already cost Synovus a great deal of lost time, trouble, and expense - all for \$1633, which S&W and its lawyers never even sought from Synovus before rushing to file the lawsuit.

We intend to file a motion for protective order seeking an Order that the 30b6 deposition is terminated. That MPO will put the facts of the last month before the Court. If you wish stipulate that the 30b6 deposition is terminated, then perhaps there would be no grounds for such a motion or order. Otherwise we will proceed with filing the MPO.

Beyond the foregoing we decline to engage with you further about this subject - the facts of the past month are clear.

Jim Butler

From: Bill Cash <bcash@levinlaw.com>
Sent: Friday, June 19, 2020 4:19 PM
To: Ramsey Prather; pbates@philipbates.net; Jim Butler; Nathanson, Paul J.; 'Haynes, Antonio M.'; Kim McCallister
Cc: Cheryl L. Haas (chaas@mcguirewoods.com); Sara Anne Ford; Matt Schultz; Virginia Buchanan; 'jwirt@wirtlawfirm.com'; 'Pam Wirt'
Subject: RE: Synovus adv. Sport & Wheat: Documents Used During Deposition

Dear Synovus colleagues,

On further reflection, we have decided not to press to complete the 30(b)(6) deposition next week. We intend to pick up the matter at a later date—after Synovus makes a full and fair production of interrogatory responses, documents, and RFAs—and we will consider if we need more deposition time then. If we do, we'll work it out with you, and if we can't, we'll file a motion to compel and we'll put the facts of yesterday before the court.

To be very clear, we do not consider this deposition concluded; it stands open and in our eyes the witness remains in the chair. You violated the Rules by walking out. We do not believe you met the standard to terminate a deposition under Rule 30(d), which requires bad faith or harassing or annoying conduct. "Bad faith" means the deposition was taken for some purpose other than advancing the case, like abusing the power to take depositions in order to cause embarrassment.

Nothing close to that happened. The witness did not complain about that; no lawyer complained about that. Your real objection was that counsel wanted to see some text messages so counsel could prep the witness and put documents in "context" before he answered. Let me underscore that these texts were Bank documents, in the full custody and control of the Bank, as equally available to you and your client as they were to mine, and the Bank has had them for months. Moreover, the deadline for us to produce our copies of these documents in response to your discovery requests hasn't run yet, and you agreed to the production of this witness under these circumstances anyway. This was a date you selected.

But we will take your objection about documents away from you. We will make production of the full set of documents that we have, including all of the texts, on our deadline under the Rules. We know you will follow the Rules and do the same—including making an exhaustive search through the company's

files and those of its employees for relevant documents, which will include all relevant communications between Synovus and Sport & Wheat. After you have done that, we will consider whether we have further questions for this witness.

On a personal note, I want to say that nobody likes scorched-earth tactics; they are exhausting, and they violate the liberal spirit of the Rules. We are willing to push the reset button with your team if you want to start over. If not, I regret that we will have to do things the hard way, but the record's going to show that we have offered over and over to try to work things out by phone and e-mail without recourse to the judge. To that end, if you want to pick up the phone and call, I am happy to discuss further.

Bill Cash III

Shareholder

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